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January 25, 2010

**VIA ECF**

Hon. Ramon E. Reyes, Jr.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Guzman v. VLM, Inc., Index No. 07-CV-1126 (JG) (RER)

Dear Judge Reyes:

We represent the Plaintiff-class in the above referenced litigation. I write in furtherance of your January 14, 2010 Minute Entry, with a status report of matters concluded to date regarding the six remaining "Disputed" class claims in this wage and hour class action.

I am happy to represent that the parties have reached an agreement with respect to the 'Disputed' claims of Messrs. Evaristo Rosales, David Berrios, Ramon Chavez and Juan Carlos Rodriguez. Earlier today I e-mailed a draft settlement agreement to defendants' counsel for review and comment. As we represented to the Court on January 14, 2010, the parties hope to have papers signed, and these four claims resolved within the next two weeks.

Regarding the two remaining disputed claims (Messrs. Alberto Hernandez and Ikram Kahan). With respect to Mr. Hernandez, we will continue to try to reconcile this claim during the next two weeks. If, after this period, we remain at an impasse, we will request that the matter be assigned to a neutral for mediation, and hearing, if needed. We have been unable to locate Mr. Kahan for months. My firm will make one last effort to reach him at his last known address. If he cannot be located we intend to apply to the court to be relieved as class counsel to this individual.

Respectfully submitted,

/s/Lloyd R. Ambinder

cc: Gary J. Dmoch (via ECF)  
Joseph M. Labuda (via ECF)